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7	Owners Association, Cal-Neva Franchise Owners Association, California Central Valley Franchise Owners Association, Greater Bay Franchise Owners
8	Association, Greater Los Angeles Franchise Owners Association, Joe Saraceno Franchise Owners
9	Association, Northern California Franchise Owners Association, Sacramento Valley Franchise Owners
0	Association, San Diego Franchise Owners Association, San Francisco/Monterey Bay Franchise
1	Owners Association, Sierra Franchise Owners
2	Association, Southern California Franchise Owners Association, West Coast Franchise Owners
3	Association
4	UNITED STATES DISTRICT COURT
5	NORTHERN DISTRICT OF CALIFORNIA
	NORTHERN DISTRICT OF CALIFORNIA EV 18 Case 8. 0 0 1 7 MISCE D Bakersfield Franchisee Owners Association, a 1 8 Case 8.
5	NORTHERN DISTRICT OF CALIFORNIA Bakersfield Franchisee Owners Association, a California unincorporated association; Cal- Neva Franchise Owners Association, a Nevada Notice Of Motion And Motion To Quash or
5	NORTHERN DISTRICT OF CALIFORNIA Bakersfield Franchisee Owners Association, a California unincorporated association; Cal- Neva Franchise Owners Association, a Nevada incorporated association; California Central Valley Franchise Owners Association, a Notice Of Motion And Motion To Quash or Modify Subpoena and for Protective Order By Petitioners Bakersfield Franchisee
15 16	Bakersfield Franchisee Owners Association, a California unincorporated association; Cal-Neva Franchise Owners Association, a Nevada (California incorporated association), a Nevada (California incorporated association), a California incorporated association; Greater (California incorporated association), a California incorporated association; Greater (California incorporated association), a California incorporated association, a (California incorporated association), a (California inc
15 16 17 18	Bakersfield Franchisee Owners Association, a California unincorporated association; Calnet Valley Franchise Owners Association; Calter Bay Franchise Owners Association; Greater Bay Franchise Owners Association; Greater Los Angeles Franchise Owners Association, a Cannot Canno
15 16 17 18 19	Bakersfield Franchisee Owners Association, a California unincorporated association; Cal- Neva Franchise Owners Association, a Nevada o incorporated association; California Central Valley Franchise Owners Association, a California incorporated association; Greater Bay Franchise Owners Association, a California incorporated association; Greater Los Angeles Franchise Owners Association, a California incorporated association; Joe Saraceno Franchise Owners Association, a Saraceno Franchis
15 16 17 18 19 20 21	Bakersfield Franchisee Owners Association, a California unincorporated association; Cal-Neva Franchise Owners Association, a Nevada of incorporated association; California Central Valley Franchise Owners Association, a California incorporated association; Greater Bay Franchise Owners Association, a California incorporated association; Greater Los Angeles Franchise Owners Association, a California incorporated association; Joe Saraceno Franchise Owners Association, a California incorporated association; Northern Sasociation, Northern California Franchise Owners Association, Northern California Franchise
15 16 17 18 19 20 21	NORTHERN DISTRICT OF CALIFORNIA Bakersfield Franchisee Owners Association, a California unincorporated association; Cal-Neva Franchise Owners Association, a Nevada incorporated association; California Central Valley Franchise Owners Association, a California incorporated association; Greater Bay Franchise Owners Association, a California incorporated association; Joe Saraceno Franchise Owners Association, a California incorporated association; Northern California Franchise Owners Association, a California Franchise Owners Association, a California incorporated association; Northern California Franchise Owners Association, a California incorporated association; Northern California Franchise Owners Association, a California incorporated association; Northern California Franchise Owners Association, San Diego
15 16 17 18 19 20 21 22 22 23	Bakersfield Franchisee Owners Association, a California unincorporated association; Cal- Neva Franchise Owners Association, a Nevada o incorporated association; California incorporated association, a California incorporated association, a California incorporated association; Greater Bay Franchise Owners Association, a California incorporated association; Greater Los Angeles Franchise Owners Association, a California incorporated association; Joe Saraceno Franchise Owners Association, a California incorporated association; Northern California Franchise Owners Association, a California incorporated association; Northern California incorporated association; Northern California incorporated association, a Californi
15 16 17 18 19 20 21 22 23 24	Bakersfield Franchisee Owners Association, a California unincorporated association; Calnorporated association; California Central Valley Franchise Owners Association, a California incorporated association; Greater Los Angeles Franchise Owners Association, a California incorporated association; Owners Association, Sacramento Valley Franchise Owners Association, San Diego Franchise Owners Association, San Diego Franchise Owners Association, San Diego Franchise Owners Association, Southern California Franchise Owners Asso
15 16 17 18 19 20 21 22 23 24 25	Bakersfield Franchisee Owners Association, a California unincorporated association; Calincorporated association; California incorporated association; Greater Los Angeles Franchise Owners Association, a California incorporated association; Joe Saraceno Franchise Owners Association, a California incorporated association; San Franchise Owners Association, a California incorporated association; San Diego Franchise Owners Association, a California incorporated association; San Franchise Owners Association, a California incorporated association,
15 16 17 18 19 20 21 22 23 24 25 26	Bakersfield Franchisee Owners Association, a California unincorporated association; Callova Franchise Owners Association, a Nevada (alifornia incorporated association), a California incorporated association; Greater Day Franchise Owners Association, a California incorporated association; Greater Los Angeles Franchise Owners Association, a California incorporated association; Joe Saraceno Franchise Owners Association, a California incorporated association; Northern California incorporated association; Northern California incorporated association; Sacramento Valley Franchise Owners Association, a California incorporated association; San Diego Franchise Owners Association, a California incorporated association; San Diego Franchise Owners Association, a California incorporated association; San Francisco/Monterey Bay Franchise Owners Association, a California incorporated association; San Francisco/Monterey Bay Franchise Owners Association, a California incorporated association; Sierra Franchise Owners Association, a California incorporated association; San Francisco/Monterey Bay Franchise Owners Association, a California incorporated association; Sierra Franchise Owners Association, Southern California Franchise Owners Association, Southern California Franchise Owners Association. Downers Association. Notice Of Motion And Motion To Quash or Modify Subpoena and for Protective Order By Petitioners Bakersfield Franchise Owners Association, California Central Valley Franchise Owners Association, California Central Valley Franchise Owners Association, California Central Valley Franchise Owners Association, Greater By Petitioners Bakersfield Franchise Owners Association, California Central Valley Franchise Owners Association, Greater Bay Franchise Owners Association, Greater Bay Franchise Owners Association, Sacramento Valley Franchise Owners Ass
15 16 17 18	Bakersfield Franchisee Owners Association, a California unincorporated association; Calincorporated association; California incorporated association, a California incorporated association; Greater Los Angeles Franchise Owners Association, a California incorporated association; Joe Saraceno Franchise Owners Association, a California incorporated association, a Califor

NOTICE OF MOTION AND MOTION TO QUASH SUBPOENA, OR, FOR PROTECTIVE ORDER

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1 2 3 4 5 6 7	Association a California incorporated association; Petitioners, V. 7-ELEVEN, INC., a Texas corporation Respondent.
8	
9	TO RESPONDENT 7-ELEVEN, INC. AND TO ITS ATTORNEYS OF RECORD,
10	JAMES F. SPEYER AND JONATHAN KOENIG, ARNOLD & PORTER, KAYE SCHOLER,
11	LLP; NORMAN M. LEON AND ELLEN BRONCHETI, DLA PIPER, LLP (US);
12	
13	PLEASE TAKE NOTICE, that Petitioners Bakersfield Franchisee Owners Association,
14	Cal-Neva Franchise Owners Association, California Central Valley Franchise Owners
15	Association, Greater Bay Franchise Owners Association, Greater Los Angeles Franchise Owners
16	Association, Joe Saraceno Franchise Owners Association, Northern California Franchise Owners
17	Association, Sacramento Valley Franchise Owners Association, San Diego Franchise Owners
18	Association, San Francisco/Monterey Bay Franchise Owners Association, Sierra Franchise
19	Owners Association, Southern California Franchise Owners Association, West Coast Franchise
20	Owners Association, will move and hereby do move, on, 2018, at
21	before the Honorable, to quash or modify the subpoenas
22	served upon them, or in the alternative, for a protective order limiting the requested document
23	discovery.
24	
25	The grounds for said motion are that the documents sought are of no, or limited, relevance,
26	are privileged, are not within the control, custody or possession of the responding Associations,
27	and producing the requested documents would be unduly burdensome and expensive. In
28	addition, the subpoenas did not allow sufficient time to respond.
	2 NOTICE OF MOTION AND MOTION TO QUASH SUBPOENA, OR, FOR PROTECTIVE ORDER

This motion is based on the Federal Rules of Civil Procedure including Rule 45 in that the subpoenas did not allow a reasonable period of time to comply under Rule 45(d)(3)(A)(i); required some third parties to travel over 100 miles for production of documents; under Rule 45(d)(3)(A)(ii); required disclosure of privileged matters under Rule 45(d)(3)(A)(iii); and subjected the moving parties to undue burden under Rule 45(d)(3)(A)(iv).

This motion is based on this notice of motion and motion, the accompanying memorandum in support, the declarations of Manjit Purewal, Yogendra Solanki, Kathy York, and Peter C. Lagarias, Esq., and on such other pleadings and evidence received at or before the hearing and ruling on the motion.

DATED: January 19, 2018

LAGARIAS & NAPELL, L.L.P.

By: Deter C

Peter C. Lagarias, Esq.

Attorneys for Petitioners Bakersfield Franchisee
Owners Association, Cal-Neva Franchise Owners
Association, California Central Valley Franchise
Owners Association, Greater Bay Franchise
Owners Association, Greater Los Angeles
Franchise Owners Association, Joe Saraceno
Franchise Owners Association, Northern California
Franchise Owners Association, Sacramento Valley
Franchise Owners Association, San Diego
Franchise Owners Association, San
Francisco/Monterey Bay Franchise Owners
Association, Sierra Franchise Owners Association,
Southern California Franchise Owners Association,
West Coast Franchise Owners Association

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